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APR 07 2021

**BAQ PERMITTING** 

New-Indy Catawba LLC P.O. Box 7 5300 Cureton Ferry Road Catawba, SC 29704 T 803-981-8000 New-indycb.com

April 5, 2021

Katharine K. Buckner
Sandhills Permitting Section
Bureau of Air Quality – Air Permitting Division
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Re:

Title V Operating Permit TV-2440-0005 Modification Request

Incorporation of Construction Permit 2440-0005-DF

New-Indy Catawba LLC

Catawba, South Carolina 29704

Dear Ms. Buckner:

New-Indy Catawba LLC (New-Indy) has prepared this construction permit application to remove an obsolete legacy production limit related to the production of bleached paper products which are no longer manufactured at the Catawba Mill (Mill).

#### Introduction

New-Indy has recently converted the Mill from bleached paper grades (lightweight coated paper and market pulp) to manufacturing unbleached or brown paper (linerboard and market pulp). New-Indy refers to this investment as Project Columbia. Construction permit DF (c/p-DF) was issued for the project by the South Carolina Department of Health and Environmental Control (SCDHEC) in July 2019. The permit was updated in May 2020 to address the April 2020 addendum to the original June 2019 application.

This second addendum has been prepared to address the obsolete legacy kraft pulp production limit from c/p-DC condition 6.B.2 and TV-2440-0005 condition C.14. This second addendum does not address aspects of the project or c/p-DF that are not impacted by the obsolete kraft pulp production limit.

#### **Project Description**

The kraft pulp production is limited to 1,825 air dried tons unbleached pulp (ADTUBP) per day (12-month rolling average) in permit condition 6.B.2 of c/p-DC and condition C.14 of TV-2440-0005. This production limit is associated with producing kraft pulp suitable for manufacturing bleached paper grades at low kappa numbers (kappa  $\sim$ 30) prior to c/p-DF (the kappa number indicates the "harshness" of the cook). Following the conversion of the Fiberline to pulp suitable for linerboard and unbleached paper grades (kappa > 90) under c/p-DF, the c/p-DC production limit is now obsolete.

A summary of the production rates and emissions used for permitting c/p-DC and c/p-DF is presented in the table below:

Construction Permit ID					
Construction Permit	DC	DF	DF		
Application Date	March 2011	June 2019	April 2020		
Digester kappa before project	28	~30	~30		
Digester kappa after project	32	>90	>90		
Kraft Pulp Pro	duction (ADTUBI	P/day)			
Baseline	1,532.5	1,542.9	1,520.0		
Could Have Accommodated	1,704.9	Not Used	Not Used		
Projected	1,825.0				
Emissions Increase from Project (tons/year)					
TSP	0.1	5.0	0.5		
PM <sub>10</sub>	0.1	1.2	(11.4)		
PM <sub>2.5</sub>	0.1	(1.5)	(11.0)		
SO <sub>2</sub>	124.8*	(9.2)	(1,262.6)		
NO <sub>X</sub>	15.8	(54.8)	(263.2)		
СО	24.1	(256.1)	(264.2)		
VOC	14.7	(10.8)	39.5		
TRS	1.8	8.3	6.9		
H₂S	< 1.8	(0.1)	2.2		
CO₂e	621	(55,535)	(55,428)		

<sup>\*</sup>PSD permit required for SO<sub>2</sub>.

The kappa was increased slightly under c/p-DC to produce more kraft pulp suitable for manufacturing bleached coated paper grades and market pulp. The c/p-DC kraft pulp production increased approximately 120 ADTUBP/day and resulted in  $SO_2$  emissions increasing 124.8 tons per year. The  $SO_2$  emissions increase from c/p-DC required a Prevention of Significant Deterioration (PSD) construction permit for  $SO_2$  that included a production limit of 1,825 ADTUBP/day as the basis of the permitted  $SO_2$  emissions increase for that project.

The kappa was increased substantially under c/p-DF and other changes were required to produce kraft pulp suitable for unbleached linerboard grades and unbleached market pulp. Although the c/p-DF baseline kraft pulp production is nearly identical c/p-DC, the permitted production increased over

ADTUBP/day while the SO<sub>2</sub> emissions have significantly decreased. PSD construction permitting was not required for c/p-DF and kraft pulp production limits are no longer necessary.

#### **Emissions Calculations**

There are no changes to the emissions calculations presented in the June 2019 application and the April 2020 addendum to c/p-DF.

#### Regulatory Applicability

There are no changes to the regulatory applicability presented in the June 2019 application and the April 2020 addendum to c/p-DF.

#### Summary

As discussed in the June 2019 application and April 2020 addendum, there is no reasonable possibility of New-Indy having a significant emissions increase of any PSD pollutant following the conversion to unbleached paper grades. Therefore, consistent with the USEPA New Source Review Policy Memorandum dated December 7, 2017<sup>1</sup>, no production limits are required because PSD permitting requirements are not applicable to c/p-DF. The legacy kraft pulp production limit in c/p-DC is now obsolete following the conversion to manufacturing unbleached paper grades and the reduction in SO<sub>2</sub> emissions. With this application we are formally requesting removal of the 1,825 ADTUBP per day production limit.

If you have any questions regarding this application please contact Daniel Mallett at (803) 981-8010 or at dan.mallett@new-indycb.com.

Sincerely,

Charles Cleveland Technical Manager

<sup>1</sup> https://www.epa.gov/sites/production/files/2017-12/documents/nsr\_policy\_memo.12.7.17.pdf



Title/Position: Environmental Manager

### **Bureau of Air Quality** Expedited Review Request Instructions APR 0.7 2021

First Name: Dan

#### **Construction Permits**

Page 1 of 2

**BAQ PERMITTING** 

Last Name: Mallett

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APPLICATION IDENTIFICATION					
Facility Name (This should be the name used to identify the facility)		Request Date			
New-Indy Catawba LLC	2440 - 0005	April 5, 2021			

Title, Tobicioni Environmentali Lanage.	The process of the state of the					
E-mail Address: dan.mallett@new-indycb.com Phone No.: (803) 981-8010 Cell No.: ( ) -						
SECONDARY AIR PERMIT CONTACT						
(If the Department is unable to contact the primary air permit contact please provided a secondary contact.)						

PRIMARY AIR PERMIT CONTACT

Mr.

S	ECONDARY AIR PERMIT CONTACT			
(If the Department is unable to contact the primary air permit contact please provided a secondary contact.)				
Title/Position:	First Name:	Last Name:		
E-mail Address: Phone No.: Cell No.: ( ) -				

Check One	Permit Type	Expedited Review Days*	Fee**
	Minor Source Construction Permit	30	\$3,000
	Synthetic Minor Construction Permit	65	\$4,000
	Prevention of Significant Deterioration (PSD) not impacting a Class I Area (no Class I modeling required)	120	\$20,000
	Prevention of Significant Deterioration (PSD) Modification not impacting a Class I Area (no Class I modeling required)  No BACT limit change but requires Public Notice	120	\$5,000
	Prevention of Significant Deterioration (PSD) Modification not impacting a Class I Area (no Class I modeling required) Number of BACT Pollutants  X \$5,000 per BACT modification	120	Total Fee \$ Maximum of \$20,000
	Prevention of Significant Deterioration (PSD) impacting a Class I Area (Class I modeling required)	150	\$25,000
	Prevention of Significant Deterioration (PSD) Modification impacting a Class I Area (Class I modeling required)  No BACT limit change but requires Public Notice	150	\$5,000
	Prevention of Significant Deterioration (PSD) Modification impacting a Class I Area (Class I modeling required)  Number of BACT Pollutants  X \$5,000 per BACT modification	150	Total Fee \$ Maximum of \$25,000
	Concrete Minor Source Construction Permit Relocation Request	10	\$1,500
	Asphalt Synthetic Minor Construction Permit Relocation Request	15	\$3,500

\*All days above are calendar days, but exclude State holidays, and building closure dates due to severe weather or other emergencies. Expedited days for asphalt and concrete also exclude weekends.

\*\*DO NOT SEND PAYMENT UNTIL THE APPLICATION HAS BEEN ACCEPTED INTO THE EXPEDITED PROGRAM. If chosen for expedited review, you will be notified by phone for verbal acceptance into the program. Fees must be paid within five business days of acceptance.



### Bureau of Air Quality Expedited Review Request Instructions Construction Permits Page 2 of 2

#### PRIMARY AIR PERMIT CONTACT SIGNATURE

I have read the most recent version of the Expedited Review Program Standard Operating Procedures and accept all of the terms and conditions within. I understand that it is my responsibility to ensure an application of the highest quality is submitted in a timely manner, and to address any requests for additional information by the deadline specified. I understand that submittal of this request form is not a guarantee that expedited review will be granted.

Signature of Primary Air Permit Contact



### Bureau of Air Quality Construction Permit Application RECEIVEL Facility Information

Page 1 of 3

APR 07 2021

April 5, 2021					BAQ PERMITTING
April 5, 2021		FACILITY ID	ENTIFICATION		
Facility Name (This should be the name used to identify the facility at the physical address (Established by the U.S. Internal Revenue Service to Identify a busines isseed below) New-Indy Catawba LLC  FACILITY PHYSICAL ADDRESS  Physical Address: 5300 Cureton Ferry Road  City: Catawba Facility Coordinates (Facility coordinates should be based at the front door or main entrance of the facility.)  Latitude: 34°50'37"N  Longitude: 80°53'25"W  CO-LOCATION DETERMINATION  Are there other facilities in close proximity that could be considered co-located? No Yes* List potential co-located facilities, including air permit numbers if applicable:  "If yes, please submit co-location applicability determination details in an attachment to this application.  COMMUNITY OUTREACH  What are the potential air issues and community concerns? Please provide a brief description of potential air issues and community concerns about the entire facility and/or specific project. Include how these issues and community concerns are being addressed, if the community has been informed of the proposed construction project, and if so, how they have been informed.  No issues or concerns related to removing the obsolete legacy production limit. Other community concerns regarding odo complaints are being addressed with regulatory agencies and the communities.  FACILITY'S PRODUCTS / SERVICES  Primary Products / Services (List the primary product and/or service) Linerboard/Pulp Manufacturing  Primary SIC Code (Standard Industrial Cassification Codes)  AIR PERMIT FACILITY CONTACT  (Person at the facility who can answer technical questions about the facility and permit application.)  Title/Position: Environmental Manager  Salutation: Mr.  First Name: Dan Last Name: Mallett  Malling Address: PO Box 7  [City: Catawba			Application Date		
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FACILITY PHYSICAL ADDRESS  Physical Address: 5300 Cureton Ferry Road    State: SC   Zip Code: 29704     Facility Coordinates (Facility coordinates should be based at the front door or main entrance of the facility.)   Latitude: 34°50'37'N   Longitude: 80°53'25'W   NAD27 (North American Datum of 1927) Or NAD83 (North American Datum of 1927) Or NAD83 (North American Datum of 1983)    CO-LOCATION DETERMINATION		ity at the physical addre	ess (Established by the U.S		
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FACILITY'S PRODUCTS / SERVICES  Primary Products / Services (List the primary product and/or service) Linerboard/Pulp Manufacturing  Primary SIC Code (Standard Industrial Classification Codes) 2631 Primary NAICS Code (North American Industry Classification System) 322130  Other Products / Services (List any other products and/or services)  Other SIC Code(s): 2611, 2621 Other NAICS Code(s): 322110, 322121  AIR PERMIT FACILITY CONTACT (Person at the facility who can answer technical questions about the facility and permit application.)  Title/Position: Environmental Manager Salutation: Mr. First Name: Dan Last Name: Mallett  Mailing Address: PO Box 7  City: Catawba State: SC Zip Code: 29704					name, consonis regularing cas.
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Title/Position: Environmental Manager Salutation: Mr. First Name: Dan Last Name: Mallett  Mailing Address: PO Box 7  City: Catawba State: SC Zip Code: 29704	(Person at the facility wi			v and nermit	application )
Mailing Address: PO Box 7 City: Catawba State: SC Zip Code: 29704				and permit	
City: Catawba State: SC Zip Code: 29704		Dalatation Fire	Tribertainer bail		Last Harrier Fidilicit
			State: SC		Zip Code: 29704
		b.com		81-8010	<u> </u>



## Bureau of Air Quality Construction Permit Application Facility Information Page 2 of 3

(Parson at the facility wh		CILITY CONTACT	application )	
		<i>questions about the facility and permit</i> to the designated Air Permit Co		
If additional individuals need of				
Name	opies of the permit		Address	
Steven Moore	714	steven.moore@all4inc.com	Addicas	
Steven Ploore		Steven.moore@an inic.com		
		771		
CC	ONFIDENTIAL IN	FORMATION / DATA	7.	
Does this application contain confidential	information or data	a? 🔲 No 🛛 Yes*		
*If yes, include a sanitized version of the applicate SUBMITTED	tion for public review a	nd <b>only one copy of confide</b>	NTIAL INFORMATION SHOULD BE	
	LIST OF FOR	MS INCLUDED		
	dentify all forms included	d in the application package)	2000	
Form Name			ed (Y/N)	
Expedited Review Request (DHEC Form 2		☐ Yes ☐ No		
Equipment/Processes (DHEC Form 2567)				
Emissions (DHEC Form 2569)   Yes				
Regulatory Review (DHEC Form 2570)				
Emissions Point Information (DHEC Form	2573)	Yes No (If No, Explain	)	
	OWNER OR	OPERATOR		
Title/Position: Technical Manager	Salutation: Mr.	First Name: Charles	Last Name: Cleveland	
Mailing Address: PO Box 7		1		
City: Catawba		State: SC	Zip Code: 29704	
E-mail Address: pete.cleveland@new-ind	vcb.com	Phone No.: 803-981-8206	Cell No.:	
		ATOR SIGNATURE		
I certify, to the best of my knowledge ar	nd belief, that no a	pplicable standards and/or reg	ulations will be contravened or	
violated. I certify that any application for	m, report, or comp	liance certification submitted in	this permit application is true,	
accurate, and complete based on informa	tion and belief form	ned after reasonable inquiry. I u	inderstand that any statements	
and/or descriptions, which are found to b	e incorrect, may re	sult in the immediate revocation	on of any permit issued for this	
application.				
Signature of Owner or Operator		04/0	6 /2021 Date	
		PREPARED THIS APPLICAT neer who has reviewed and signed this		

Salutation: Mr.

First Name: Steven

Phone No.: (919) 234-5981

State: NC

Last Name: Moore

Zip Code: 27560

Cell No.: (864) 616-4711

Title/Position: Senior Project Manager

Mailing Address: 630 Davis Drive, Suite 220

E-mail Address: steven.moore@all4inc.com

SC Professional Engineer License/Registration No. (if applicable):

Consulting Firm Name: ALL4

City: Durham



## Bureau of Air Quality Construction Permit Application Facility Information Page 3 of 3

PROFESSIONAL ENGINEER INFORMATION					
Consulting Firm Name: ALL4					
Title/Position: PE	Salutation: Ms.	First Name: Amy	Last Name: Marshall		
Mailing Address: 630 Davis Drive	e, Suite 220				
City: Durham		State: NC	Zip Code: 27560		
E-mail Address: amarshall@all4i	nc.com	Phone No.: (984) 777-	-3073 Cell No.:		
SC License/Registration No.: 22:	147	Annual Conference (Conference of Conference			
	PROFESSIONAL EN	GINEER SIGNATURE			

I have placed my signature and seal on the engineering documents submitted, signifying that I have reviewed this construction permit application as it pertains to the requirements of South Carolina Regulation 61-62, Air Pollution Control Regulations and Standards.

Signature of Professional Engineer

3(25/2021 Date



## Bureau of Air Quality Construction Permit Application Equipment / Processes Page 1 of 2

			ICATION IDEN					
	(Please ensure ti	hat the information list in this table is the same on a	all of the forms and r					·
Facility Name					SC Air Permit Numl		Applicati	on Date
١,		identify the facility)			(Leave blank if one has			
New-Indy Cat	awba LLC				2440 - 0005		April 5, 2	2021
			DOJECT DECC	DIDTION	***			
			ROJECT DESCI					
Brief Project L	Description (W	hat, why, how, etc.): Remove obsolete le	egacy kraft pulp j	production iim	IIT.			-
			ATTACHME	NTC				
Drococc El	ow Diagram	Location in Applicat			and April 2020 Ad	dendum		
	ow Diagram roject Descrip							
Detailed P	roject bescrip	tion Location in Application. See	Julie 2013 Appli	cation and Ap	ili 2020 Addendam			
		EQUIPN	IENT / PROCESS	INFORMATION	ON			
Equipment ID Process ID	Action	Equipment / Process Description	Maximum Design Capacity (Units)	Control Device ID(s)	Pollutants Controlled (Include CAS#)	Capture System Eff and Description		Emission Point ID(s)
5210 - 5255	Add Remove Modify Other	Kraft Pulp Mill (Continuous Digester System, Turpentine Recovery System, Pulp Washing System, Pulp Refining and Washing)		5260, 5260C, 5270, 2605, 3705	VOC, HAPs, TRS	LVHC Collection Sy LVHC System Ca Scrubber, HVLC Collection Sy	ustic	2610S1, 2610S2
	Add Remove Modify Other Add Remove Modify							
	Other							

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APR 07 2021

**BAQ PERMITTING** 



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# Bureau of Air Quality Construction Permit Application Equipment / Processes Page 2 of 2

Control Device ID Action Control Device Description Design Capacity (Units) Inherent/Required/Voluntary (Explain) Destruction/Removal Efficiency Determination	
	ion
5260C, 5270, 2605, 3705 See June 2019 Application and April 2020 Addendum	
☐ Add ☐ Remove ☐ Modify ☐ Other	
☐ Add ☐ Remove ☐ Modify ☐ Other	

	RAW MATERIAL AND P	RODUCT INFORMATION	
Equipment ID Process ID Control Device ID	Raw Material(s)	Product(s)	Fuels Combusted
5210-5255	Wood, cooking liquor	Unbleached pulp	none

MONITORING AND REPORTING INFORMATION						
Equipment ID Process ID Control Device ID	Pollutant(s)/Parameter(s) Monitored	Monitoring Frequency	Reporting Frequency	Monitoring/Reporting Basis	Averaging Period(s)	
5210-5255		See June 2019 /	Application and April 2020	Addendum		



## Bureau of Air Quality Construction Permit Application Emissions Page 1 of 2

(Please ensure that the information list in this table is the	APPLICATION II			his construction permit	annlication na	ockade )	
Facility Name	same on all of the forms (	and required informa	•	Number (8-digits o		plication	Data
(This should be the name used to identify the facility)				ne has never been assig		piication	Date
New-Indy Catawba LLC			2440 - 0005	_	,	ril 5, 202	21
					L.		
		IMENTS					-
	II the appropriate checkb				alea aka		
Sample Calculations, Emission Factors Used, etc.				umptions, Bottlene			
See June 2019 and April 2020 Permit Applications				Permit Application	15		
Supporting Information: Manufacturer's Data, etc.		Source Test		Daniel Annilantian	_		
See June 2019 and April 2020 Permit Applications	·	<u></u>		Permit Application	is		
Details on Limits Being Taken for PTE Emissions	1	NSR Analysis				1	
See project description for discussion of removing obsolete	e legacy production	,	cription for als	cussion of removir	ig obsolete	legacy	production
limit.		limit.					
CHMMARY OF BROID	TEN CHANCE IN	ACTI TTV MEDI	POTENTAL	EMICCIONC			
SUMMARY OF PROJECT				EW12210N2			
	Calculated at maxim			T =======	alan Baka	- A61	
		ion Rates Prior			sion Rate		(
Poliutants		Modification (		Construction /			
	Uncontrolled	Controlled	PTE	Uncontrolled	Controlle	<u>:d</u>	PTE
Particulate Matter (PM)							
Particulate Matter <10 Microns (PM <sub>10</sub> )							
Particulate Matter < 2.5 Microns (PM <sub>2.5</sub> )							
Sulfur Dioxide (SO <sub>2</sub> )							
Nitrogen Oxides (NO <sub>x</sub> )							
Carbon Monoxide (CO)		See June 2	2019 and April	2020 Permit Appli	cations		
Volatile Organic Compounds (VOC)							
Lead (Pb)							
Highest HAP Prior to Construction (CAS #: 67561)							
Highest HAP After Construction (CAS #: 67561)							
Total HAD Emissions*	1						

Include emissions from exempt equipment and emission increases from process changes that were exempt from construction permits.

(\*All HAP emitted from the various equipment or processes must be listed in the appropriate "Potential Emission Rates at Maximum Design Capacity" Table)



# Bureau of Air Quality Construction Permit Application Emissions Page 2 of 2

	POTENTIAL EMISSION RATES AT MAXIMUM DESIGN CAPACITY												
Equipment ID	Emission	Pollutants	Calculation Methods / Limits Taken /	Uncon	trolled	Contr	olled	PTE					
/ Process ID	Point ID	(Include CAS #)	Other Comments	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr				
5210-5255	ALL	ALL	See June 2019 and April 2020 Permit Applications										



# Bureau of Air Quality Construction Permit Application Regulatory Review Page 1 of 2

APPLICATION IDENTIFICATION											
(Please ensure that the information list in this table is the same on all of the forms and required information submitted in this construction permit application package.)											
Facility Name (This should be the name used to identify the facility)	SC Air Permit Number (8-digits only) (Leave blank if one has never been assigned)	Application Date									
New-Indy Catawba LLC	2440 - 0005	April 5, 2021									

STATE AND FEDERAL AIR POLLUTION CONTROL REGULATIONS AND STANDARDS  (If not listed below add any additional regulations that are triggered.)												
	Appli	cable		work practices, monitoring, red	ord keeping, etc.							
Regulation	Yes	FADISID ADDITCADITION ! -		List the specific limitations and/or requirements that apply.	How will compliance be demonstrated?							
Regulation 61-62.1, Section II(E) Synthetic Minor Construction Permits			See June 2019 Ap	oplication and April 2020 Addendur	m							
Regulation 61-62.1, Section II(G) Conditional Major Operating Permits			See June 2019 Ap	oplication and April 2020 Addendur	n							
Regulation 61-62.5, Standard No. 1 Emissions from Fuel Burning Operations		See June 2019 Application and April 2020 Addendum										
Regulation 61-62.5, Standard No. 2 Ambient Air Quality Standards		See June 2019 Application and April 2020 Addendum										
Regulation 61-62.5, Standard No. 3 Waste Combustion and Reduction			See June 2019 Ap	oplication and April 2020 Addendur	m							
Regulation 61-62.5, Standard No. 4 Emissions from Process Industries			See June 2019 A	oplication and April 2020 Addendur	m							
Regulation 61-62.5, Standard No. 5 Volatile Organic Compounds			See June 2019 A	oplication and April 2020 Addendur	m							
Regulation 61-62.5, Standard No. 5.2 Control of Oxides of Nitrogen			See June 2019 Ap	oplication and April 2020 Addendur	n							
Regulation 61-62.5, Standard No. 7 Prevention of Significant Deterioration*			See June 2019 A	oplication and April 2020 Addendur	m							
Regulation 61-62.5, Standard No. 7.1  Nonattainment New Source Review*			See June 2019 A	oplication and April 2020 Addendur	m							
Regulation 61-62.5, Standard No. 8 Toxic Air Pollutants			See June 2019 A	oplication and April 2020 Addendur	m							



# Bureau of Air Quality Construction Permit Application Regulatory Review Page 2 of 2

STATE	AND FE		AIR POLLUTION CONTROL RE listed below add any additional regulations	GULATIONS AND STANDARDS that are triggered.)								
	Appli		Include all limits, work practices, monitoring, record keeping, etc.									
Regulation	Yes No		Explain Applicability Determination	List the specific limitations and/or requirements that apply.	How will compliance be demonstrated?							
Regulation 61-62.6 Control of Fugitive Particulate Matter			See June 2019 A	pplication and April 2020 Addendur	n							
Regulation 61-62.68 Chemical Accident Prevention Provisions		See June 2019 Application and April 2020 Addendum										
Regulation 61-62.70 Title V Operating Permit Program		See June 2019 Application and April 2020 Addendum										
40 CFR Part 64 - Compliance Assurance Monitoring (CAM)		See June 2019 Application and April 2020 Addendum										
40 CFR 60 Subpart A - General Provisions			See June 2019 A	pplication and April 2020 Addendu	m							
40 CFR 60 Subpart BB/BBa - Kraft Pulp Mill NSPS			See June 2019 A	pplication and April 2020 Addendu	m							
40 CFR 61 Subpart A - General Provisions			See June 2019 A	pplication and April 2020 Addendu	m							
40 CFR 63 Subpart A - General Provisions			See June 2019 A	pplication and April 2020 Addendu	m							
40 CFR 63 Subpart S - Pulp and Paper MACT			See June 2019 A	pplication and April 2020 Addendu	m							
Construction Permit DC – Condition 6.B.2		×	Obsolete legacy kraft pulp production limit no longer applies									
TV-2440-0005 - Condition C.14		⊠	Obsolete legacy kraft pulp production limit no longer applies									

<sup>\*</sup> Green House Gas emissions must be quantified if these regulations are triggered.



### Bureau of Air Quality Emission Point Information Page 3 of 4

A. APPLICAT	TION IDENTIFICATION	
1. Facility Name: New-Indy Catawba LLC		
2. SC Air Permit Number (if known; 8-digits only): 2440 - 0005	3. Application Date: April 5, 202	1
4. Project Description: Remove obsolete legacy kraft pulp production limit.		
B. FACIL	ITY INFORMATION	
	2. If a Small Business or small	government facility, is Bureau assistance being
1. Is your company a Small Business? ☐ Yes ☒ No	requested?	
	Yes No	
3. Are other facilities collocated for air compliance? ☐ Yes ☒ No	4. If Yes, provide permit numbe	rs of collocated facilities:
C. A	AIR CONTACT	
Consulting Firm Name (if applicable):		
Title/Position: Environmental Manager Salutation: Mr	r. First Name: Daniel	Last Name: Mallett
Mailing Address: P.O. Box 7		
City: Catawba	State: SC	Zip Code: 29704
E-mail Address: dan.mallett@new-indycb.com	Phone No.: (803) 981-8010	Cell No.:
•		
	IT DISPERSION PARAMETERS	
Source data requirements are based on the appropriate source classification. Each emission plata requirements. Include sources on a scaled site map. Also, a picture of area or volume	point is classified as a point, area, volume, or flar sources would be helpful but is not required. A	e source. Contact the Bureau of Air Quality for clarification of user generated document or spreadsheet may be substituted
in lieu of this form provided all of the required emission point parameters are submitted in the	e same order, units, etc. as presented in these to	bles.
Abbreviations / Units of Measure: UTM = Universal Transverse Mercator; °N = Degrees North;	°W = Degrees West; m = meters; AGL = Above	Ground Level; ft = feet; ft/s = feet per second; ° = Degrees;
°F = Degrees Fahrenheit		



#### Bureau of Air Quality Emission Point Information Page 4 of 4

	E. POINT SOURCE DATA  (Point sources such as stacks, chimneys, exhaust fans, and vents.)														
Emission Point ID	Description/Name	Poi	nt Source C Projection:		es	Release Height AGL (ft)	Temp.	Exit	Inside Diameter (ft)	Discharge	Rain	Distance To Nearest		Building	
		UTM E (m)	UTM N (m)	Lat (°N)	Long (°W)		(°F)	Velocity (ft/s)		Orientatio n	Cap? (Y/N)	Property Boundary (ft)	Height (ft)	Length (ft)	Width (ft)
ALL					See June	e 2019 ar	nd April	2020 Per	mit Appli	cations					
									<u> </u>						

	F. AREA SOURCE DATA  (Area sources such as storage piles, and other sources that have low level or ground level releases with no plumes.)												
Emission Point ID	Description/Name		Projection:			Release Height AGL	Easterly Length	Northerly Length	Angle From North	Distance To Nearest Property Boundary			
Point 10		(m)	UTM N (m)	Lat (°N)	Long (°W)	(ft)	(ft)	(ft)	(1)	(ft)			

	G. VOLUME SOURCE DATA  (Volume sources such as building fugitives that have initial dispersion vertical depth prior to release.)												
Emission Point ID	Description/Name	Volume Sou Project UTM E UTM I (m) (m)	on:	Long (°W)	Release Height - AGL (ft)	Initial Horizontal Dimension (ft)	Initial Vertical Dimension (ft)	Vertical Dimension Distance To Nearest					



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			(Doint or	ourcoc :	-	I. FLARE SOU		ha tin of the s	tack )				
Emission		Fla	re Source Projection	Coordinat		e combustion t Release Hei		Release Rate	Distance To Nearest	Building			
Point ID	Description/Name	UTM E (m)	UTM N (m)	Lat (°N)	Long (°W)	AGL (ft)		(BTU/hr)	Property Boundary (ft)	Height (ft)	Length (ft)	Widt (ft)	
					I. ARI	A CIRCULAR	SOURCE DAT	ГА					
Emission	Description/Name		ircular Sou Projection		linates		Release Heigh	t	Radius of Are	a	Distance To Nearest Property Boundary		
Point ID	Description/Name	UTM E (m)	UTM N (m)	Lat (°N)	Long (°W)		AGL (ft)	(ft)	(ft)				
l					1 /	AREA POLY SO	NIDCE DATA						
		Aroa	Poly Source	- Coordin		AREA POLI S	JURCE DATA						
Emission		Alea	Projection		iates	R	elease Height						
Point ID	Description/Name	UTI (n	ΜE	5	M N m)	1 "	AGL (ft)		Numbe	er of Vertices			
	to the second se							**		# A A A A A A A A A A A A A A A A A A A			
<u> </u>					K.	<b>OPEN PIT SO</b>	OURCE DATA						
Emission	Description/Name		Pit Source Projection:			Release Height	Release Height   Easterly Length		Volume	Angle	Angle From North (°)		
Point ID		UTM		LITA	4 N	AGL (ft)	(ft)	Length (ft)	(ft³)	Angle From North ( )			



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	L. EMISSION RATES													
Emission	Pollutant Name	CAS#	<b>Emission Rate</b>	Same as	Controlled or	Averaging								
Point ID	Poliutant Name	CAS #	(lb/hr)	Permitted (1)	Uncontrolled	Period								
ALL	See Ju	ne 2019 and April	2020 Permit Applic	ations										
				Yes No										
				Yes No										

<sup>(1)</sup> Any difference between the rates used for permitting and the air compliance demonstration must be explained in the application report.